



New-Indy Catawba LLC
Catawba, South Carolina
Proposed Procedures

Pursuant to Paragraph 52(c)(i) of the May 13, 2021 EPA Order ("Order"), New-Indy Catawba LLC ("New-Indy") provides its proposed procedures ("Remedial Plan") for operating the Catawba Mill to meet the hydrogen sulfide ("H₂S") concentration specified in Paragraph 52(b). New-Indy provides supporting documentation on a Sharefile site referenced in the cover letter that accompanies the proposed Remedial Plan.

As New-Indy has indicated previously, New-Indy installed three continuous H₂S monitoring stations at and around the Catawba Mill in April to begin measuring levels of H₂S. New-Indy is encouraged that the initial data from the monitoring stations at New-Indy's property boundary indicate H₂S concentrations are well below the concentrations identified in Paragraph 52(b) of the Order. New-Indy proposes to continue to meet the H₂S concentrations specified in Paragraph 52(b) by complying with the conditions in New-Indy's applicable air permits (provided herewith), and New-Indy's NPDES permit (included herewith). Specifically, New-Indy has restarted its steam stripper and submitted to SC DHEC its Notice of Intent to Conduct Performance Testing and test protocol to comply with 40 CFR 63, Subpart S on May 17, 2021.

Additionally, the wastewater treatment plant is operated pursuant to the NPDES permit and operations plans. Those operations plans are attached herewith. New-Indy is in the process of revising the O& M Manual and Odor Abatement plan in accordance with its new operations that began in February 2021. DHEC's May 7, 2021 Order requires a comprehensive evaluation of New-Indy's wastewater treatment plant. This is in process. New-Indy is actively removing fiber from the aerated stabilization basin ("ASB") and is completing additional repairs to the ASB.

New-Indy also is providing an Executive Summary of its draft Quality Assurance Monitoring Plan ("QAPP") for the operation of the ambient monitors in accordance with paragraph 52(c)(ii) of the Order. The draft QAPP also includes supporting documentation in the form of equipment user manuals and standard operating procedures. New-Indy will include feedback from EPA in the final QAPP and provide it to EPA on or before June 1, 2021. Further, New-Indy has provided plans for addressing safety procedures, shutdown procedures, and access restrictions while work is performed on the ambient monitors (included herewith).